

REMARKS

The Examiner is thanked for the performance of a thorough search.

By this amendment, Claims 1, 4, 5, 9, 16 and 22 have been amended and Claims 24-34 have been newly added. Claims 2, 3, 6-8, 10-15, 17-21 and 23 have been canceled. Hence, Claims 1, 4, 5, 9, 16, 22 and 24-34 are pending in the application. No new matter has been added to the application.

CHANGE OF ATTORNEY DOCKET NUMBER REQUESTED

Please use the new docket number “50277-2935” in all future correspondence with Applicant’s attorney for this application.

THE PENDING CLAIMS ARE PATENTABLE OVER THE CITED ART

Claims 1, 2 and 16-23 were rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent Application US 2004/0230605 A1, entitled “Method, System, and Product for Data Integration through a Dynamic Common Model” by Tamboli et al. (*“Tamboli”*) filed April 6, 2004.

Claims 1, 2, 5-10, 14, 16, 17 and 19-23 were also rejected under 35 U.S.C. § 103(a) as being unpatentable over the admitted prior art (“*APA*”) in the application in view of U.S. Patent Application US 2004/0 A1, entitled “System, Method, and Computer Program Product for Efficiently Translating Relational Tuples to Object-Oriented Object” by Srinivasan et al. (*“Srinivasan”*) filed April 6, 1999.

Applicants respectfully traverse.

Each pending claim recites at least one limitation that is not disclosed, taught, or suggested by *Tamboli* or *APA* in view of *Srinivasan*.

CLAIM 1

Claim 1 recites:

receiving a first request to execute a first function that is capable of returning data from two or more sources, wherein said two or more sources includes a first data source and a second data source;
in response to receiving said first request, performing the steps of: determining that said first data source is associated with said first request,
in response to determining that said first data source is associated with said first request, executing a second function to obtain, from said first data source, first organization and data type information describing first data returned from said first source, and
after performing said first function against said first data source, returning first result data, wherein said first result data reflects said first organization and data type information; and
wherein said first result data is in a same format as the first data as stored in the first data source;
receiving a second request to execute said first function, wherein said second request is different from said first request; and
in response to receiving said second request, performing the steps of:
determining that said first data source is associated with said second request,
in response to determining that said second data source is associated with said second request, executing said second function to obtain, from said second data source, second organization and data type information describing second data returned from said second source, and
after performing said first function against said second data source, returning second result data, wherein said second result data reflects said second organization and data type information; and

wherein said second result data is in a same format as the second data as stored in the second data source

At least the above-bolded portions of Claim 1 are not disclosed, taught, or suggested by *Tamboli* or *APA* in view of *Srinivasan*.

DIFFERENCES BETWEEN CLAIM 1 AND TAMBOLI

The Office Action alleged that *Tamboli* paragraphs [0075]-[0077] teach each of the limitations in Claim 1. However, Claim 1 recites limitations that were not disclosed within the cited paragraphs of *Tamboli*. Claim 1 recites “*wherein said first [second] result data is in a same format as the first [second] data as stored in the first [second] data source*”. The bracketed part of the claim reflects the second request of the claim performing a similar action as the first request. *Tamboli* does not recite the limitation that the data is returned in the same format as the data as stored in the data source. In *Tamboli*, the data is transformed in each instance, from a first native format to a common dynamic format. The data is then transformed from the common dynamic format to a second native format. Each transformation requires a mapping to the new format. Claim 1, however, simply “*execut[es] a second function to obtain, from said first data source, first organization and data type information describing first data returned from said first source*” and then “*return[s] first result data... wherein said first result data is in a same format as the first data as stored in the first data source*”. Thus, not all of the limitations of Claim 1 are disclosed or taught in *Tamboli*.

Additionally, the Office Action alleges that the second function’s actions are disclosed in par. [0077] of *Tamboli*. Claim 1 recites “*execut[es] a second function to obtain, from said first data source, first organization and data type information describing first data returned from said first source*” and then “*after performing said first function against said first data*

source, returning first result data”. *Tamboli* discloses how transformation services transform data from a native mapping format into a dynamic common format. An adaptor provides source data from the XML document so that the transformation service can locate an XML stylesheet with the mappings and translation rules. Thus, in *Tamboli*, the actual data is initially retrieved from the data source to perform data type identification, not after data types are already identified as in Claim 1.

Furthermore, Claim 1 recites that a second function returns the organization and data type information and that the data types are “*obtain[ed], from said first data source*”. Thus, the types are determined by looking at the data source and not in the actual data. In *Tamboli*, the data types are determined by examining the data itself.

It is respectfully submitted that, for at least the above reasons, *Tamboli* does not disclose, teach, or suggest the above-bolded elements of Claim 1. As at least one element is not disclosed, taught, or suggested by *Tamboli*, Claim 1 is patentable over the cited art and is in condition for allowance.

DIFFERENCES BETWEEN CLAIM 1 AND APA IN VIEW OF SRINIVASAN

The Office Action alleges that the first function is disclosed as *APA*. However, Claim 1, as amended, recites limitations that were not disclosed within the *APA*. Specifically, the Claim 1 limitation “*return first result data, wherein said first result data reflects said first organization and data type information; and wherein said first result data is in a same format as the first data as stored in the first data source*” was not disclosed. One characteristic of the *APA* was that the result data returned had “no information about the formatting of fields within the blob”. *Written Spec. p. 6*. In Claim 1, the result data contains the organization and data type information when it is returned by the first function.

With respect to *Srinivasan*, Claim 1 recites “*in response to determining that said first data source is associated with said first request, executing a second function to obtain, from said first data source, first organization and data type information describing data returned from said first source*”. Information about the data returned in the first function is not obtained from the data itself, but from the data source. *Srinivasan* discloses setting attributes of the application objects using information in the tuples, or the data itself. Thus, in *Srinivasan*, the actual data is used from the data source to perform data type identification, not after data types are already identified as in the Claims. Retrieving the data after the data types are identified allows the database server to dynamically obtain the data type information so that additional requests can be made with no change made to the functions.

CLAIM 31

Claim 31 recites:

receiving a request to execute a first function that returns a data structure capable of storing any data type;
wherein the data structure contains data from a data source;
executing a second function that generates and returns a list of data types to be returned by the first function;
wherein the list of data types is received from the data source indicated by the first function;
registering query duration types based upon the list of data types;
generating output buffers according to the query duration types;
completing query processing using the query duration types;
executing the first function to obtain a collection of data in the data structure;
extracting the collection of data in the data structure;
sending the extracted collection of data in the data structure to the output buffers; and
returning the data in the output buffers according to the query duration types.

At least the above-bolded portions of Claim 31 are not disclosed, taught, or suggested by *Tamboli* or *APA* in view of *Srinivasan*.

DIFFERENCES BETWEEN CLAIM 31 AND TAMBOLI

The Office Action alleged that *Tamboli* paragraphs [0075]-[0077] teach each of the limitations in Claim 31. However, Claim 31, as amended, recites limitations that were not disclosed within the cited paragraphs of *Tamboli*. Specifically, “*registering query duration types based upon the list of data types; generating output buffers according to the query duration types; completing query processing using the query duration types*” was not disclosed. *Tamboli* failed to disclose or teach an object analogous to query duration types, much less output buffers generated according to the query duration types. Furthermore, the query duration types are used in query processing which *Tamboli* also fails to disclose.

It is respectfully submitted that, for at least the above reasons, *Tamboli* does not disclose, teach, or suggest the above-bolded elements of Claim 31. As at least one element is not disclosed, taught, or suggested by *Tamboli*, Claim 31 is patentable over the cited art and is in condition for allowance.

DIFFERENCES BETWEEN CLAIM 31 AND APA IN VIEW OF SRINIVASAN

Claim 31 recites the use of query duration types and output buffers generated according to those query duration types. Claim 31 recites, “*registering query duration types based upon the list of data types; generating output buffers according to the query duration types; completing query processing using the query duration types*” was not disclosed. Both *APA* and *Srinivasan*, alone or in combination, failed to disclose or teach an object analogous to query duration types, much less output buffers generated according to the query duration

types. Furthermore, the query duration types are used in query processing which neither *APA* nor *Srinivasan* disclose.

It is respectfully submitted that, for at least the above reasons, *APA* in view of *Srinivasan* does not disclose, teach, or suggest the above-bolded elements of Claim 31. As at least one element is not disclosed, taught, or suggested by *APA* in view of *Srinivasan*, Claim 31 is patentable over the cited art and is in condition for allowance.

CLAIMS 16, 22 and 33

Claim 16 contain limitations similar to Claim 1 except Claim 16 is recited in computer system format. Therefore, Claim 16 is patentable for at least the reasons given above with respect to Claim 1.

Claims 22 and 33 contain limitations similar to Claims 1 and 31 except Claims 22 and 33 are recited in computer-readable medium format. Therefore, Claims 22 and 32 also are patentable for at least the reasons given above with respect to Claims 1 and 31.

DEPENDENT CLAIMS

Claims 4, 5, 9, 24-30, 32 and 34 directly depend upon independent Claims 1, 16, 22, 31 and 33. Therefore, these dependent claims also include the limitations of the independent claim upon with they depend. Thus, dependent Claims 4, 5, 9, 24-30, 32 and 34 are patentable for at least those reasons given above with respect to Claims 1, 16, 22, 31 and 33. In addition, each of Claims 4, 5, 9, 24-30, 32 and 34 introduce one or more additional limitations that independently render it patentable. However, due to the fundamental differences already identified, to expedite the positive resolution of this case a separate discussion of those

limitations is not included at this time, although the Applicants reserve the right to further point out the differences between the cited art and the novel features recited in the dependent claims.

CONCLUSION

For the reasons set forth above, it is respectfully submitted that all of the pending claims are now in condition for allowance. Therefore, the issuance of a formal Notice of Allowance is believed next in order, and that action is most earnestly solicited.

The Examiner is respectfully requested to contact the undersigned by telephone if it is believed that such contact would further the examination of the present application.

Please charge any shortages or credit any overages to Deposit Account No. 50-1302.

Respectfully submitted,
HICKMAN PALERMO TRUONG & BECKER LLP



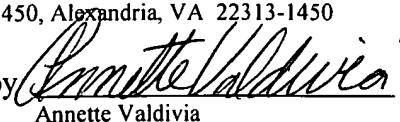
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on 2/7/07

by 
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